



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 22, 2022

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Andrew Franzone, 21 Cr. 446 (VSB)*

Dear Judge Broderick:

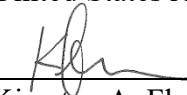
On June 10, 2022, the Court set a deadline for defense pre-trial motions of June 24, 2022, with the Government's response due by July 8, 2022, and defense reply, if any, due by July 15. (Dkt. 31.) Due to a scheduling conflict, the Government requested a brief adjournment of its response deadline, to July 22, 2022, which the Court granted. The Government writes to respectfully request a further adjournment to July 29, 2022, and a corresponding adjournment of the defense reply deadline, to August 5, 2022. The Government has conferred with defense counsel, who consent to this request.

The Government further requests that the Court adjourn the status conference currently scheduled for August 3, 2022 to an afternoon the week of August 15, 2022. The Government further requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the new conference date, in the interests of justice and to allow for the completion of briefing of pre-trial motions; defense counsel consents to this request.

Respectfully submitted,

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Angela Lipsman, Esq., *counsel to the defendant* (via ECF)